

★ OCT 22 2018 ★

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

X

LONG ISLAND OFFICE

Nancy F. Manz

Plaintiff(s),

-against-

REQUEST FOR  
CERTIFICATE OF  
DEFAULT  
18-CV-5171 (JFB)(AYS)

Eileen Giagrasso, Manuela Ignacio  
Defendant(s).  
Patrice Kelley, Mary Goldin  
Lori Raffinelli, Richard Murphy

RECEIVED

OCT 22 2018

EDNY PRO SE OFFICE

TO: DOUGLAS C. PALMER  
UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

Please enter the default of defendant(s), Eileen Giagrasso Et al

pursuant to Rule 55(a) of the Federal Rules of Civil Procedure for failure to plead or otherwise defend this action as fully appears from the court file herein and from the attached affirmation of

Dated: 10.22.2018

By: Nancy F. Manz  
(Signature)

Nancy F. Manz  
(Print name)

65 GREYSTONE ROAD  
(Address)

Rockville Centre NY 11570

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-X

Nancy F. Manz

**Plaintiff(s)**

**AFFIRMATION IN SUPPORT  
OF  
REQUEST FOR CERTIFICATE  
OF DEFAULT**

CV - - ( )

Eileen Gingrasso Et Al

Defendant(s).

--x

Nancy Flynt hereby declares as follows:

1. I am the plaintiff in this action.
2. This action was commenced pursuant to 42 U.S.C. 1983 / 18 USC 2510-2521
3. The time for defendant(s), Eileen Giagrasco et al to answer or otherwise

move with respect to the complaint herein has expired.

4. Defendant(s), Eileen Giagrasso et al, has not answered or otherwise moved with respect to the complaint, and the time for defendant(s) Eileen Giagrasso et al to answer or otherwise move has not been extended.

5. That defendant(s) Eileen Giagrasso et al is not an infant or incompetent. Defendant(s) Eileen Giagrasso et al not presently in the military service of the United States as appears from facts in this litigation.

6. Defendant(s) Eileen Giagrasso et al is indebted to plaintiff,  
, in the following manner (state the facts in support of the claim(s)):

On ~~17 Mar~~ On March 27, 2018 I became aware through conversation that Eileen Giagrasso on March 25, 2018

listened (as I believe was a regular practice) to my conversations with colleagues and a doctor who was giving a telephone postoperative report to a patient's family member. This revelation alarmed me and upset me. I knew that this was illegal practice. She listened on a electronic device that was not known to anyone in the room. On April 2nd, I reported this evidence of a felon (NY State) to Mary Golden (Dept Head Human Resources) and Lori Roffinelli (Ethics Committee SNCH). At the time I told them about many other instances that this criminal behavior (see attached)

WHEREFORE, plaintiff Nancy F. Manz requests that the default of defendant(s) Eileen Giagrasso Et al be noted and a certificate of default issued.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief, that the amount claimed is justly due to plaintiff, and that no part thereof has been paid.

Dated:

10/22/2018

By: Nancy F. Manz  
(Signature)  
(Print Name of Plaintiff Pro Se)  
(Address)  
(Telephone Number)  
(E-mail address)

Nancy F. Manz  
65 Greystone Road  
Rockville Centre NY 11570

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Email nancy.manz55@gmail.com

(1st page of attachment)

affected other employees in our department (PACU at SNCH)

Ms Goldin and Ms Roffinelle, after this 90 minute meeting whereby I gave evidence that Manuela, Ignacio, Patrice Kelly and Eileen were aware, and participated in this behavior on a regular basis.

Ms Goldin and Ms Roffinelle assured me that this crime would be investigated. In fact they thanked me for the report saying "you saw something, and said something" that is what we want."

However, this "Eavesdropping" on March 24 2018 which occurred for 6 hours from 9am until after 2<sup>30</sup> pm, was never investigated.

Instead, I was harassed over 2 months by Mary Goldin, Patrice Kelly and Manuela Ignacio with false statements and lies.

On June 20. 2018 my position was terminated and I was laid off without cause.

Our Department had 3 open positions, I was not offered any of them. Of the 138 people laid off, I was the only ~~not~~ direct patient care position eliminated in the hospital.

The Hospital had told its board that no patient care RNs would be eliminated

(2nd page)

I am accusing Eileen Giagrasso of "eavesdropping" with an electronic device without a warrant.

I am accusing Manuela Ignacio and Patrice Kelley of participating in this practice. I also am accusing them of harboring felonious behavior of Eileen Giagrasso on the date of March 24.2018 and conspiring to cover up the crime.

I am accusing Mary Golden and Lori Roffinelli of harboring the felony of Eileen Giagrasso and Patrice Kelley and Manuela Ignacio as of April 2. 2018 (on or about)

I am accusing Richard Murphy, CFO of South NASSAU Community Hospital (SNCH) of harboring the felonious behavior of Eileen Giagrasso, Patrice Kelley, Manuela Ignacio and ~~others~~ possibly others.

No signs were ever posted, as is the law, that areas could be under Audio Surveillance.

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Nancy F. Manz, Plaintiff(s),

CERTIFICATE OF  
DEFAULT

-against-

CV - - ( )

Eileen Giagrasso, Manuela Ignacio  
Patrick Kilday, Mary Goldie<sup>Defendant(s).</sup>  
Lou Raffineeli, Richard Murphy

I, Douglas C. Palmer, Clerk of Court of the United States District Court for the Eastern District of New York, do hereby certify that the defendant Eileen Giagrasso et al/ has not filed an answer or otherwise moved with respect to the complaint herein. The default of defendant Eileen Giagrasso et al/ is hereby noted pursuant to Rule 55(a) of the Federal Rules of Civil Procedure.

Dated: \_\_\_\_\_, New York  
, 20\_\_\_\_

DOUGLAS C. PALMER, Clerk of Court

By: \_\_\_\_\_  
Deputy Clerk

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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Plaintiff(s),

Nancy F. Manz  
-against-

Eileen Giagrasso, Et Al

Defendant(s).

AFFIRMATION OF SERVICE

-----CV-----( ) ( )

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I Nancy F. Manz, declare under penalty of perjury that I have served a copy of the attached Request for Certificate of Default, upon Eileen Giagrasso, Manuela Ignacio, Patrick Kelly, Mary Goleber  
John Raffinelli, Richard Murphy by mailing it to \_\_\_\_\_

whose address is: South Nassau Community Hospital

Dated: 10 - 22, 2018  
Central Islip, New York

Nancy F. Manz  
Signature

65 Greystone Road

Address

Rockville Centre NY  
11570

City, State & Zip Code